

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ULKU ROWE,

Plaintiff,

-v.-

GOOGLE LLC,

Defendant.

19 Civ. 08655 (JHR)

VERDICT FORM

JENNIFER H. REARDEN, District Judge:

According to the principles of law as charged by the Court and the facts as you find them, please answer the following questions:

**I. Liability****A. New York Labor Law § 194**

1. Has Plaintiff, Ulku Rowe, proved by a preponderance of the evidence that Defendant Google paid Ms. Rowe less than Nicholas Harteau or Stuart Breslow in violation of New York Labor Law § 194?

Nicholas Harteau: YES \_\_\_\_\_ NO Stuart Breslow: YES \_\_\_\_\_ NO 

*If your answer is "No" to both persons in Question 1, proceed to Question 3 without answering Questions 2. If your answer is "Yes" to either person in Question 1, proceed to Question 2 only as to the person(s) for whom you answered "Yes."*

2. Has Defendant, Google, proved by a preponderance of the evidence that the differential in pay between Ms. Rowe and Mr. Harteau or Mr. Breslow was the result of a bona fide factor other than sex, which was job-related and justified by business necessity?

Nicholas Harteau: YES \_\_\_\_\_ NO \_\_\_\_\_

Stuart Breslow: YES \_\_\_\_\_ NO \_\_\_\_\_

**B. New York City Human Rights Law (Gender Discrimination)**

3. Has Plaintiff, Ulku Rowe, established by a preponderance of the evidence that Defendant, Google, has on at least one occasion treated her less well, at least in part, because of her gender?

YES  NO \_\_\_\_\_

**C. New York City Human Rights Law (Retaliation)**

4. Has Plaintiff, Ulku Rowe, established by a preponderance of evidence that Defendant, Google, has on at least one occasion retaliated against her in violation of the New York City Human Rights Law?

YES  NO \_\_\_\_\_

**D. New York Labor Law (Retaliation)**

5. Has Plaintiff, Ulku Rowe, established by a preponderance of evidence that defendant, Google, has on at least one occasion retaliated against her in violation of the New York Equal Pay Law?

YES  NO \_\_\_\_\_

*If you answered "No" to Questions 3, 4, and 5 and either answered "No" to both persons in Question 1 or "Yes" to both persons in Question 2, please do not answer any further questions and have the foreperson sign and date the verdict sheet. Otherwise, please answer the questions in Section II.*

**II. Damages**

6. Has Plaintiff, Ulku Rowe, proven by a preponderance of the evidence that she suffered any injury or any actual damages as a result of Google's unlawful conduct?

YES  NO \_\_\_\_\_

*If you have answered "Yes" to Question 6, please proceed to Question 7. If you have answered "No" to Question 6, you must award Plaintiff Ulku Rowe \$1: Stop here, have the foreperson sign and date this Verdict Sheet, and advise the Court by note that you have reached a verdict.*

**A. Back Pay**

7. What amount of back pay, if any, do you find that Plaintiff, Ulku Rowe, has proved by a preponderance of the evidence?

\$  O

**B. Statutory Damages Under New York Labor Law**

8. Of the amount awarded in Question 7, how much, if any, is attributable to damages incurred in connection with answering Yes to Section I.A?

\$ \_\_\_\_\_

9. Has Defendant, Google, proved by a preponderance of the evidence that it had a good faith and reasonable basis to believe that its underpayment, as found in Question 8, was in compliance with the law?

YES \_\_\_\_\_ NO \_\_\_\_\_

*If your answer is "No" to Question 9, please proceed to Question 10. If your answer is "Yes" to Question 9, please proceed to Question 11 without answering Question 10.*

10. Has Plaintiff, Ulku Rowe, proved by a preponderance of the evidence that Google's underpayment, as found in Question 8, was willful?

YES \_\_\_\_\_ NO \_\_\_\_\_

**C. Compensatory Damages Under New York City Human Rights Law**

11. If you answered "Yes" to Question 3 or Question 4, state the amount of non-economic damages that you award to the Plaintiff, if any, for emotional distress, pain and suffering, or mental anguish:

\$ 150,000

**D. Punitive Damages Under New York City Human Rights Law**

12. If you answered "Yes" to Question 3 or Question 4, do you find that Defendant, Google, should be subjected to punitive damages under the New York City Human Rights Law?

YES ✓ NO \_\_\_\_\_

13. If you answered "Yes" to Question 12, state the amount of punitive damages, if any, that you award to Plaintiff:

\$ 1 million

*Please have the foreperson sign and date this Verdict Sheet and advise the Court by note that you have reached a verdict.*

Dated: 10 / 20, 2023  
New York, New York



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John Doe  
FOREPERSON